

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

_____	)	
UNITED STATES OF AMERICA	)	
	)	
	)	CRIMINAL ACTION
V.	)	NO. 4:13-cr-40027-TSH
	)	
GREGORY GUERTIN,	)	
Defendant	)	
_____	)	

ASSENTED-TO MOTION TO CONTINUE SENTENCING HEARING FOR 90 DAYS

NOW COMES Daniel W. Cronin, counsel for the defendant Gregory Guertin, and moves that this Honorable Court continue the sentencing hearing currently scheduled for March 11, 2014, for a period of ninety (90) days thereafter; and suspend and continue the corresponding deadlines and time standards for sentencing submissions accordingly.

As reason for this request, undersigned defense counsel represents that he is scheduled for surgery on January 30, 2014, with resulting inpatient hospitalization for at least seven (7) days, and an anticipated four (4) to six (6) week home recovery after discharge from the hospital. The defendant is not in custody and is in compliance with the terms of his pre-trial release. The government, through AUSA Scott Garland, assents to this request.

WHEREFORE, defense counsel requests that the sentencing hearing currently scheduled for March 11, 2014, be continued for a period of ninety (90) days thereafter; and that the corresponding deadlines and time standards for sentencing submissions be continued accordingly.

Respectfully submitted,

THE DEFENDANT,

GREGORY GUERTIN,  
By His Attorney,

/s/ Daniel W. Cronin  
Daniel W. Cronin, Esquire  
One Exchange Place  
Worcester, MA 01608  
(508) 795-0900  
B.B.O. # 548200

DATED: January 28, 2014

DEFENDANT'S CERTIFICATE OF SERVICE ON ASSENTED-TO  
MOTION TO CONTINUE SENTENCING HEARING FOR 90 DAYS

I, Daniel W. Cronin, attorney for the defendant, hereby certify that the document entitled ASSENTED-TO MOTION TO CONTINUE SENTENCING HEARING FOR 90 DAYS was filed through the ECF system and will be sent electronically to the registered participants as identified in the Notice of Filing (NEF) and to Pre-Trial Services by electronic mail on same date.

/s/ Daniel W. Cronin  
Daniel W. Cronin, Esquire

DATED: January 28, 2014